

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

ROBERT E. HILL AND  
SHIRLEY J. HILL, HIS WIFE

Plaintiffs

-vs-

JAMES C. CLARK, Deceased, et al.

Defendants

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CASE NO. 2914E

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MOTION FOR ORDER OF DEFAULT

Plaintiffs, Robert E. Hill and Shirley J. Hill, by counsel, Fisher & Walcek, move for an Order of Default against Defendant, Estella M. Summers, under the authority to Rule 2-613, and as grounds for the Motion, represent unto this Honorable Court as follows:

1. Defendant, Estella M. Summers, was served by March 7, 1987, in Myersville, Maryland, as evidenced by the Affidavit of Service, filled herein, Said defendant had thirty (30) days to file an answer or other responsive pleading and has failed to do so within that time.

2. Said defendant is not in military service as that term is defined in the Soldiers' and Sailors' Civil Relief Act of 1940, as amended, being an elderly lady, either retired or unemployed.